

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

C.D.A., minor child, and Mr. A., his father;
and E.A.Q.A., minor child, and Mr. Q., his
father,

Plaintiffs,

v.

United States of America,

Defendant.

Civil Action No. 21-469

JOINT STIPULATED MOTION TO HOLD CASE IN ABEYANCE

The parties jointly move the Court for an order holding this action in abeyance for an additional period of sixty (60) days. In support of this motion, the parties respectfully state the following:

1. On August 31, 2021, the parties jointly executed a stipulation to hold the action in abeyance for sixty (60) days. (Doc. No. 19.)
2. On September 2, 2021, after a telephone conference with counsel, the Court approved that joint stipulation, holding the case in abeyance through November 1, 2021. (Doc. No. 21.)
3. The United States, along with a group of counsel who are coordinating negotiations on behalf of plaintiffs and claimants, are engaged in a nationwide effort to settle district court cases and pending administrative tort claims arising

from family separations at the U.S./Mexico border that occurred during the prior administration. While significant progress has been made, due to the scale and complexity of the effort, additional time is needed to achieve a global resolution of these matters.

4. In order to facilitate continued progress, the parties respectfully move the Court for an order holding this action, including all proceedings and case deadlines, in abeyance for an additional period of sixty (60) days.

5. Counsel for Plaintiffs and the United States have conferred regarding this request and agreed to jointly move the Court to hold this action in abeyance. A proposed Order is submitted herewith.

Dated: October 29, 2021

Respectfully submitted,

/s/ Veronica Finkelstein
VERONICA J. FINKELSTEIN
Assistant United States Attorney

*Counsel for the United States of
America*

/s/ Karen L. Hoffmann
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Karen Hoffmann, certify that on October 29, 2021, I served a copy of the Joint Stipulated Motion to Hold Case in Abeyance on all parties by CM/ECF.

Date: October 29, 2021

/s/ Karen L. Hoffmann
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